

William Ramey

From: Saul, Andrew <ASaul@kilpatricktownsend.com>
Sent: Monday, December 17, 2018 3:38 PM
To: William Ramey; Harry Laxton; Delona Laxton; Tina Hueske
Cc: ATT_Traxcell@klgates.com; ATT-Traxcell-Team; KAnderson@wileyrein.com; David Finkelson; JLowery@mcguirewoods.com; TVanHoutan@mcguirewoods.com; Jacob.Schneider@hklaw.com; Jacob.Baron@hklaw.com; Allison.Lucier@hklaw.com; ravi.deol@klgates.com; william.sterling@hklaw.com
Subject: RE: Traxcell v. AT&T (Lead Case) - M&C for Rule 4-3 Submission (TRX0009.LIT000)

Bill,

AT&T has heard back from T-Mobile, Sprint and Verizon, and we would all oppose your motion. By our count, there are 21 terms in dispute. We feel that is reasonable number of terms across four patents.

Regards,
Andrew

Andrew N. Saul

Kilpatrick Townsend & Stockton LLP

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From: William Ramey <wramey@rameyfirm.com>
Sent: Monday, December 17, 2018 4:26 PM
To: Saul, Andrew <ASaul@kilpatricktownsend.com>; Harry Laxton <hlaxton@rameyfirm.com>; Delona Laxton <dlaxton@rameyfirm.com>; Tina Hueske <thueske@rameyfirm.com>
Cc: ATT_Traxcell@klgates.com; ATT-Traxcell-Team <ATT-Traxcell-Team@kilpatricktownsend.com>; KAnderson@wileyrein.com; David Finkelson <dfinkelson@mcguirewoods.com>; JLowery@mcguirewoods.com; TVanHoutan@mcguirewoods.com; Jacob.Schneider@hklaw.com; Jacob.Baron@hklaw.com; Allison.Lucier@hklaw.com; ravi.deol@klgates.com; william.sterling@hklaw.com
Subject: RE: Traxcell v. AT&T (Lead Case) - M&C for Rule 4-3 Submission (TRX0009.LIT000)

The sooner the motion is filed the more reasonable the request. How much more time do you need?

Bill

From: Saul, Andrew <ASaul@kilpatricktownsend.com>

Sent: Monday, December 17, 2018 3:22 PM

To: William Ramey <wramey@rameyfirm.com>; Harry Laxton <hlaxton@rameyfirm.com>; Delona Laxton <dlaxton@rameyfirm.com>; Tina Hueske <thueske@rameyfirm.com>

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Subject: RE: Traxcell v. AT&T (Lead Case) - M&C for Rule 4-3 Submission (TRX0009.LIT000)

Bill,

Given the new deadlines, do you still intend to file your motion this afternoon?

Regards,
Andrew

Andrew N. Saul

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From: Saul, Andrew

Sent: Monday, December 17, 2018 1:48 PM

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Cc: ATT_Traxcell@kgates.com; ATT-Traxcell-Team <ATT-Traxcell-Team@kilpatricktownsend.com>; KAnderson@wileyrein.com; David Finkelson <dfinkelson@mcguirewoods.com>; JLowery@mcguirewoods.com; TVanHoutan@mcguirewoods.com; Jacob.Schneider@hklaw.com; Jacob.Baron@hklaw.com; Allison.Lucier@hklaw.com; ravi.deol@kgates.com; william.sterling@hklaw.com

Subject: RE: Traxcell v. AT&T (Lead Case) - M&C for Rule 4-3 Submission (TRX0009.LIT000)

Bill,

For AT&T, we are checking with our client this afternoon. On a related note, have you had a chance to consider either of our proposed constructions for the '388 patent below?

Term	Proposed Construction
a second processor ('388 patent – claims 1, 11)	“a processor within the wireless communications network”

preference flags (‘388 patent – claims 1, 11, 21)	“two or more flags to control access to the tracking of the user and access to the user’s account”
--	--

Thanks,
Andrew

Andrew N. Saul

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From: William Ramey <wramey@rameyfirm.com>

Sent: Monday, December 17, 2018 10:31 AM

To: Saul, Andrew <ASaul@kilpatricktownsend.com>; Harry Laxton <hlaxton@rameyfirm.com>; Delona Laxton <dlaxton@rameyfirm.com>; Tina Hueske <thueske@rameyfirm.com>

Cc: ATT_Traxcell@kgates.com; ATT-Traxcell-Team <ATT-Traxcell-Team@kilpatricktownsend.com>; KAnderson@wileyrein.com; David Finkelson <dfinkelson@mcguirewoods.com>; JLowery@mcguirewoods.com; TVanHoutan@mcguirewoods.com; Jacob.Schneider@hklaw.com; Jacob.Baron@hklaw.com; Allison.Lucier@hklaw.com; ravi.deol@kgates.com; william.sterling@hklaw.com

Subject: RE: Traxcell v. AT&T (Lead Case) - M&C for Rule 4-3 Submission (TRX0009.LIT000)

Importance: High

Andrew,

I wanted to follow up on the motion to limit claim terms, have you decided if you are opposed?

We will file at the end of the day today.

Bill

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From: Saul, Andrew <ASaul@kilpatricktownsend.com>

Sent: Friday, December 14, 2018 2:50 PM

To: William Ramey <wramey@rameyfirm.com>; jthomas@hicks-thomas.com

Cc: ATT_Traxcell@klgates.com; ATT-Traxcell-Team <ATT-Traxcell-Team@kilpatricktownsend.com>; KAnderson@wileyrein.com; David Finkelson <dfinkelson@mcguirewoods.com>; JLowery@mcguirewoods.com; TVanHoutan@mcguirewoods.com; Jacob.Schneider@hklaw.com; Jacob.Baron@hklaw.com; Allison.Lucier@hklaw.com; ravi.deol@klgates.com; william.sterling@hklaw.com

Subject: RE: Traxcell v. AT&T (Lead Case) - M&C for Rule 4-3 Submission

Bill,

Please find below the constructions for the '388 patent which we referenced on our meet and confer this afternoon. Please let us know if Traxcell is agreeable, and again, we are happy to discuss further if you'd like.

Term	Proposed Construction
a second processor ('388 patent – claims 1, 11)	"a processor within the wireless communications network"
preference flags ('388 patent – claims 1, 11, 21)	"two or more flags to control access to the tracking of the user and access to the user's account"

Regards,
Andrew

Andrew N. Saul

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From: Saul, Andrew

Sent: Thursday, December 13, 2018 4:08 PM

To: 'William Ramey' <wramey@rameyfirm.com>; jthomas@hicks-thomas.com

Cc: ATT_Traxcell@klgates.com; ATT-Traxcell-Team <ATT-Traxcell-Team@kilpatricktownsend.com>; KAnderson@wileyrein.com; David Finkelson <dfinkelson@mcguirewoods.com>; JLowery@mcguirewoods.com; TVanHoutan@mcguirewoods.com; Jacob.Schneider@hklaw.com; Jacob.Baron@hklaw.com; Allison.Lucier@hklaw.com; ravi.deol@klgates.com; william.sterling@hklaw.com

Subject: RE: Traxcell v. AT&T (Lead Case) - M&C for Rule 4-3 Submission

Bill,

Thank you. 2:00 ET works for defendants. I'll send an invite.

Regards,
Andrew

Andrew N. Saul

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From: William Ramey <wramey@rameyfirm.com>

Sent: Thursday, December 13, 2018 11:52 AM

To: Saul, Andrew <ASaul@kilpatricktownsend.com>; jthomas@hicks-thomas.com

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Subject: RE: Traxcell v. AT&T (Lead Case) - M&C for Rule 4-3 Submission

Importance: High

Andrew,

It was a pleasure to meet you at the hearing.

My apologies on not responding in time for the meet ad confer.

How is your Friday? I am generally available in the afternoon.

Does your side want to take the lead on the Joint Statement? (Drafting it?)

Bill

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From: Saul, Andrew <ASaul@kilpatricktownsend.com>

Sent: Tuesday, December 11, 2018 2:08 PM

To: William Ramey <wramey@rameyfirm.com>; jthomas@hicks-thomas.com

Cc: ATT_Traxcell@klgates.com; ATT-Traxcell-Team <ATT-Traxcell-Team@kilpatricktownsend.com>; KAnderson@wileyrein.com; David Finkelson <dfinkelson@mcguirewoods.com>; JLowery@mcguirewoods.com; TVanHoutan@mcguirewoods.com; Jacob.Schneider@hklaw.com; Jacob.Baron@hklaw.com; Allison.Lucier@hklaw.com; ravi.deol@klgates.com; william.sterling@hklaw.com

Subject: Traxcell v. AT&T (Lead Case) - M&C for Rule 4-3 Submission

Bill,

Our Rule 4-3 submission is due December 20th. Are you available for a meet and confer **this Thursday, December 13th at 10:00 am CT**? Please let me know, and I'll send an invite.

Regards,
Andrew



Andrew N. Saul

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